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UNITED STATES DISTRICT COURT  
 DISTRICT OF NEVADA

ORACLE USA, INC., a Colorado  
 corporation; ORACLE AMERICA,  
 INC., a Delaware corporation; and  
 ORACLE INTERNATIONAL  
 CORPORATION, a California  
 corporation,

Plaintiffs,

v.

RIMINI STREET, INC., a Nevada  
 corporation; SETH RAVIN, an  
 individual

Defendants.

Case No. 2: 10-cv-0106-LRH-PAL

**PLAINTIFFS' MOTION TO SEAL THE  
 UNREDACTED COPIES OF ORACLE'S  
 OBJECTION TO ORDER OF DISCOVERY  
 MAGISTRATE DENYING MOTION TO  
 MODIFY PROTECTIVE ORDER AND THE  
 DECLARATION OF MARJORY A. GENTRY IN  
 SUPPORT THEREOF**

Pursuant to the Stipulated Protective Order governing confidentiality of documents entered by the Court on May 21, 2010, Dkt. 55 (“Protective Order”), and Rules 5.2 and 26(c) of the Federal Rules of Civil Procedure, Plaintiffs Oracle USA, Inc., Oracle America, Inc., and Oracle International Corporation (together “Oracle” or “Plaintiffs”) respectfully request that the Court order the Clerk of the Court to file under seal an unredacted copy of Oracle’s Objection to Order of Discovery Magistrate Denying Motion to Modify Protective Order (the “Oracle’s Objection”) as well as an unredacted copy of the Declaration of Marjory A. Gentry in Support of Oracle’s Objection to Order of Discovery Magistrate Denying Motion to Modify Protective Order (the “Gentry Declaration”). An unredacted copies of Oracle’s Objection and the Gentry Declaration were individually lodged under seal with the Court on July 23, 2012. *See* Dkt. 371, 372.

Sealing of the unredacted copy of Oracle’s Objection is requested because the redacted portions of Oracle’s Objection contains information that CedarCrestone, Inc. (“CedarCrestone”), the party which produced the information, has designated as “Confidential Information” and “Highly Confidential Information - Attorneys’ Eyes Only” under the terms of the Protective Order. Likewise, sealing of the unredacted copy of the Gentry Declaration is requested because the redacted portions of the Gentry Declaration contains information that either CedarCrestone and/or Oracle, have designated as “Confidential Information” and “Highly Confidential Information - Attorneys’ Eyes Only.” The Protective Order states, “Counsel for any Designating Party may designate any Discovery Material as ‘Confidential Information’ and ‘Highly Confidential Information - Attorneys’ Eyes Only’ under the terms of this Protective Order **only if such counsel in good faith believes that such Discovery Material contains such information and is subject to protection under Federal Rule of Civil Procedure 26(c).** The designations by any Designating Party of any Discovery Material as ‘Confidential Information’ or ‘Highly Confidential Information - Attorneys’ Eyes Only’ shall constitute a representation that an attorney for the Designating Party reasonably believes there is a valid basis for such designation.” Protective Order ¶ 2 (emphasis supplied).

1 CedarCrestone has identified the information redacted in Oracle's Objection and the  
2 Gentry Declaration as Confidential and Highly Confidential, and therefore CedarCrestone has  
3 represented that good cause exists for sealing those portions of the documents. This is a  
4 sufficient showing of good cause to permit a sealing order on a non-dispositive motion. *See,*  
5 *e.g., Pac. Gas & Elec. Co. v. Lynch*, 216 F. Supp. 2d 1016, 1027 (N.D. Cal. 2002).

6 Oracle has submitted all non-redacted portions of Oracle's Objection and the Gentry  
7 Declaration which allows the public access to all but the redacted portions of these documents.  
8 Accordingly, the request to seal is narrowly tailored.

9 For the foregoing reasons, Oracle respectfully requests that the Court find that good cause  
10 exists to file under seal the unredacted copy of Oracle's Objection and the Gentry Declaration.  
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13 DATED: July 23, 2012

BINGHAM McCUTCHEN LLP

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16 By: /s/ Geoffrey M. Howard

17 Geoffrey M. Howard  
18 Attorneys for Plaintiffs  
19 Oracle USA, Inc., Oracle America, Inc.  
20 and Oracle International Corp.  
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